



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

FEB 27 2013

URGENT LEGAL MATTER
CERTIFIED MAIL 7012 1010 0001 8097 3659
RETURN RECEIPT REQUESTED

Knight Drive, Inc.
546 Hillyer High Road
Anniston, Alabama 36207

Re: Information Request Letter

RECEIVED
MAR - 1 2013
WATER DIVISION

Dear Sir or Madam:

Pursuant to Section 308 of the Clean Water Act, 33 U.S.C. § 1318, the U.S. Environmental Protection Agency, Region 4 hereby requests Knight Drive, Inc. to provide the information set forth in Enclosure A herein.

The EPA would appreciate your assistance in providing the information requested in the enclosed Information Request. Please provide the information being requested **within 30 days of receipt of this letter**. Your response should be sent to:

Mr. David Phillips
Environmental Engineer
U.S. Environmental Protection Agency, Region 4
Clean Water Enforcement Branch
Municipal and Industrial Enforcement Section
61 Forsyth Street S.W.
Atlanta, Georgia 30303

Failure to respond to this letter, or falsification of any information in the response, may result in the issuance of an administrative, civil or criminal action with penalties of up to \$37,500 per day.

If you believe that any of the requested information is Confidential Business Information (CBI), you may assert a business confidentiality claim by stamping documents you wish to protect with a suitable stamp such as "confidential," "trade secret" or "CBI." Please separate documents that you wish to protect as CBI from non-confidential documents.

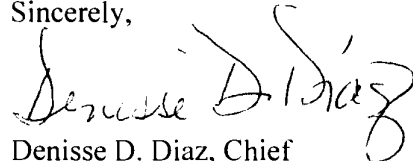
If you do not assert a CBI claim, the EPA may make information submitted under this request available to the public without further notice to you. Additional information regarding the EPA's requirements for confidential treatment of information can be found in Subpart B, Part 2, 40 C.F.R. § 2.201 *et seq.*

The Securities and Exchange Commission (Commission) requires its registrants to periodically disclose environmental legal proceedings in statements filed with the Commission. To assist you, the EPA has enclosed a document entitled "Notice of Securities and Exchange Commission Registrants Duty to Disclose Environmental Legal Proceedings."

We have also enclosed a document that provides information for small businesses that may be subject to an EPA enforcement action. This document is for your use and to assist you in understanding the compliance assistance resources and tools available to you.

If you have any questions concerning this matter, please contact Mr. David Phillips, Environmental Engineer, at (404) 562-9773 or via email at phillips.david@epa.gov. You may also have your attorney contact Ms. Suzanne Armor, Associate Regional Counsel, at (404) 562-9701.

Sincerely,

A handwritten signature in black ink, appearing to read "Denisse D. Diaz", written over a horizontal line.

Denisse D. Diaz, Chief
Clean Water Enforcement Branch
Water Protection Division

Enclosures

cc: Ms. Glenda Dean, Chief ✓
Alabama Department of Environmental Management

EPA SECTION 308 INFORMATION REQUEST

Instructions

1. Please provide a separate narrative response to each and every Question and subpart of a Question set forth in this information request.
2. Precede each answer with the number of the Question to which it corresponds.
3. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question to which it responds.
4. You must provide the information requested even though you may contend that it includes confidential business information (CBI) such as trade secrets. You may, if you desire, assert a CBI claim covering part or all of the information requested, under 40 C.F.R. § 2.203(b), by attaching to such information at the time it is submitted, a cover sheet with the words “trade secret,” “proprietary” or “company confidential” stamped or typed on it. Information covered by such claim will be disclosed by the EPA only to the extent, and only by means, of the procedures set forth in the regulation set forth above. If you do not assert a confidentiality claim, when you submit your information to the EPA, the EPA may disclose the information to the public without further notice to you. You should read the above cited regulations carefully before asserting a CBI claim, since certain categories of information are not properly the subject of such a claim.

Definitions

The following definitions shall apply to the following words as they appear in the Questions below:

5. All terms not defined herein shall have their ordinary meanings, unless such terms are defined in the Clean Water Act or its implementing regulations, in which case the statutory or regulatory definitions shall control.
6. Words in the masculine may be construed in the feminine if appropriate, and vice versa, and words in the singular may be construed in the plural if appropriate, and vice versa, in the context of a particular question or questions.
7. The terms “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed outside its scope.
8. The term “identify” means, with respect to a natural person, to set forth the person’s name, present or last known business address and business telephone number, present or last known home address and home telephone number, and present or last known job title, position or business.
9. The term “identify” means, with respect to a document, to provide its customary business description; its date; its number, if any (invoice or purchase order number); the identity of the author, addressee and/or recipient; and substance of the subject matter.
10. The term “identify” means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship), to set forth its full name, address, legal form (e.g., corporation, partnership, etc.), organization, if any, and a brief description of its business.

11. The term “Facility” means the facility located at 370 Knight Drive, Oxford, Talladega County, Alabama.
12. The term “you” shall mean Knight Drive, Inc., an Alabama corporation, and/or any agent, company, entity, or corporation responding on your behalf.

Questions

Please provide the EPA with the following information or documents pertaining to the corporate history and structure of Aerospace Coatings International, Inc. (ACI, Inc.) and Knight Drive, Inc.; additional information may be provided if deemed useful or explanatory. The majority of the response can be submitted either in scanned electronic form on compact disk or in paper form. The required certification must be an original signature in paper form.

13. Provide a copy of the Articles of Formation for ACI, Inc., dated on or around March 16, 2001.
14. Provide a copy of the Articles of Amendment for ACI, Inc. and/or Knight Drive, Inc., dated on or around November 14, 2011.
15. Is Knight Drive, Inc. the successor to all liabilities, including those under the Clean Water Act, of Aerospace Coatings International, Inc. (ACI, Inc.)?
16. If your answer to Question No. 15 above is anything but an unqualified “no,” describe in detail Knight Drive, Inc.’s past and current relationship with Aerospace Coatings International, Inc. and Aerospace Coatings International, LLC and the facility located at 370 Knight Drive, Oxford, Talladega County, Alabama (hereinafter, “Facility”). Provide all copies of any sales agreements, indemnification agreements, merger documents, assignments, and/or leases.
17. Describe the relationship between Knight Drive, Inc. and the following:
 - a. Aerospace Coatings International, Inc.;
 - b. Aerospace Coatings International, LLC;
 - c. Wencor Group, LLC;
 - d. IPC Aerospace Corporation;
 - e. Adelbert Marsh;
 - f. Industrial Plating Co., Inc.; and
 - g. Scenic, LLC.

At the end of your response to this information request, please include the following certification:

“I certify that I have personally reviewed the information contained in this response to the information request and the response is truthful, accurate and complete. I further certify that the response to the information request contains all documents responsive to the

request. I am aware that there are significant penalties for submitting false information including the possibility of further enforcement under the CWA.

Name

Title”

END

ENCLOSURE B

RIGHT TO ASSERT BUSINESS CONFIDENTIALITY CLAIMS **(40 C.F.R. Part 2)**

Except for effluent data, you may, if you desire, assert a business confidentiality claim as to any or all of the information that EPA is requesting from you. The EPA regulation relating to business confidentiality claims are found at 40 C.F.R. Part 2.

If you assert such a claim for the requested information, EPA will only disclose the information to the extent and under the procedures set out in the cited regulations. If no business confidentiality claim accompanies the information, EPA may make the information available to the public without any further notice to you.

40 C.F.R. §2.203(b). **Method and time of asserting business confidentiality claim.** A business which is submitting information to EPA may assert a business confidentiality claim covering the information by placing on (or attaching to) the information, at the time it is submitted to EPA, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Allegedly confidential portions of otherwise non-confidential documents should be clearly identified by the business, and may be submitted separately to facilitate identification and handling by EPA. If the business desires confidential treatment only until a certain date or until the occurrence of a certain event, the notice should so state.